CLERK'S OFFICE U.S. DIST. COURT AT ABINGDON, VA FILED

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA ABINGDON DIVISION

MAY 2 7 2016

IN THE MATTER OF THE SEARCH OF INFORMATION ASSOCIATED WITH "staceypomrenke@gmail.com" THAT IS STORED AT PREMISES CONTROLLED BY GOOGLE

No. 1:16 mj 73 (Sealed)

MOTION TO QUASH SEARCH AND SEIZURE WARRANT

Stacey Pomrenke, by counsel, moves the Court to quash a seizure and search warrant issued by the United States and directed to INFORMATION ASSOCIATED WITH "STACEYPOMRENKE@GMAIL.COM" LOCATED AT GOOGLE, INC., 1600

Amphitheatre Parkway, Mountain View, CA (Subject: [8-2308000011813] on the grounds that such email account contains privileged and confidential information between the defendant Pomrenke and legal counsel regarding *inter alia* privileged information between the defendant and her attorneys protected by the attorney-client privilege, such emails including information both to the attorneys and from the attorneys regarding trial strategy, information, legal questions, and other privileged matters. In addition thereto such account contains personal financial information, church correspondence, correspondence involving her husband and other matters which are not relevant nor material to the issues pending before this Court. Notice of the filing of this motion to quash has been given to Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA (via email to usernotice@google.com, Subject: [8-230800011813]

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By counsel

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R. Wayna Austin

Counsel for Stacey Pomrenke

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of May, 2016, I caused the foregoing to be hand delivered to Zachary T. Lee, Esq.,U. S. Attorney's Office, Abingdon, Virginia.

R. Wayne Austin

Scyphers & Austin, P.C.

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